

JILL DILLARD vs CITY OF SPRINGDALE

SEEWALD, JESSA on 09/13/2021

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION

JILL DILLARD, JESSA SEEWALD,  
JINGER VUOLO, and JOY DUGGAR,  
PLAINTIFFS,

VS.

CITY OF SPRINGDALE, ARKANSAS;  
WASHINGTON COUNTY, ARKANSAS;  
KATHY O'KELLEY, in her Individual  
and Official Capacities; ERNEST  
CATE, in his Individual and  
Official Capacities; RICK HOYT,  
in his Individual and Official  
Capacities; STEVE ZEGA, in his  
Official Capacity;  
Does 1-10, Inclusive,  
DEFENDANTS.

CASE NO.  
17-CV-05089-TLB

ORAL AND VIDEOTAPED DEPOSITION OF  
JESSA SEEWALD

September 13, 2021

ORAL AND VIDEOTAPED DEPOSITION OF JESSA SEEWALD,  
produced as a witness at the instance of the  
DEFENDANTS, and duly sworn, was taken in the  
above-styled and numbered cause on the 13th day of  
September, 2021, from 10:03 a.m. to 2:57 p.m., before  
Tammie L. Foreman, CCR in and for the State of  
Arkansas, RPR, CRR, reported by machine shorthand, via  
audio-video conference, pursuant to the Federal Rules  
of Civil Procedure.



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EXHIBIT

3

tabbles

1 A. -- I suppose I could have been wrong.

2 Q. Sure. Do you recall when you googled the report  
3 in May of 2015 and read it whether you remember seeing  
4 your name appear in the report?

5 A. No, I did not see my name.

6 Q. Okay. Did you see any of your coplaintiffs'  
7 names, Jill Dillard, Jinger Vuolo, Joy Duggar, or  
8 their maiden names in the report?

9 A. No, sir. But there were five of us girls in the  
10 household at the time, and four of us were victims.  
11 So it didn't take much to deduce.

12 Q. Okay. You said at the time. At the time of  
13 what?

14 A. At the time when the report would have been  
15 written.

16 Q. Okay. Who was -- if -- if the four of you that  
17 are plaintiffs in this lawsuit were the four victims,  
18 who was the fifth daughter?

19 A. My sister Jana.

20 Q. Okay. And is it your understanding that she was  
21 never molested by Josh?

22 A. She wasn't.

23 Q. Okay. What was your understanding, if you had  
24 any, as to why the DHS worker came to your house that  
25 day when you were somewhere between 10 and 14?

1 in that sense, but family business. My dad does real  
2 estate, so we would help flip houses. Or he does a  
3 lot of commercial real estate, too. And so some of my  
4 sisters and I would help him with design. And we also  
5 did a TV show for a while, so I guess that's kind of  
6 work.

7 Q. Right.

8 A. And yeah.

9 Q. Some of your sisters do social media for income.  
10 Have you ever done any of that?

11 A. Yes, sir. I do.

12 Q. What platforms are you on?

13 A. Instagram, Twitter, Facebook, and YouTube.

14 Q. And just ballpark, how much income did you bring  
15 in through social media last year?

16 A. I'm not sure. Maybe -- if I were to guess,  
17 maybe 30,000.

18 Q. Okay.

19 A. But it could be more or less.

20 Q. Sure. What is your husband's name?

21 A. Ben Seewald. Benjamin Seewald.

22 Q. What does he do?

23 A. He's a pastor.

24 Q. Oh, okay. What church?

25 A. Immanuel Baptist Church in Springdale.



1 way. Do you know one way or the other whether your  
2 name was ever printed by any publication as a victim  
3 of Josh's molestations prior to your interview on  
4 Megyn Kelly's Show?

5 A. I don't believe so.

6 MR. BLEDSOE: Object to the form.

7 Q. Okay. On Megyn Kelly's show, you identified  
8 yourself as one of Josh's victims, correct?

9 A. Yes, sir.

10 Q. Okay. And I believe you also spoke about the  
11 molestation and the redacted disclosures and the  
12 effects of all of that in the first few episodes of  
13 the second TV show, right?

14 MR. BLEDSOE: Object to the form.

15 A. Yes.

16 Q. Okay. Other than the Megyn Kelly interview and  
17 those first few episodes of the second TV show, have  
18 you ever publically discussed or communicated in  
19 writing about the molestation, the redacted  
20 disclosures, or the effects of either or both of  
21 those?

22 A. Not to my knowledge.

23 Q. Okay. I believe one of your sisters recently  
24 released a book. Have you ever worked on a book or  
25 pitched a book about your life?

1 A. My sisters and I wrote a book together.

2 Q. Yeah. What's the name of that book?

3 A. Growing up Duggar.

4 Q. When was that published?

5 A. Before any of us were married. I don't know  
6 when that was. Maybe 2012. I don't know.

7 Q. And, of course, there was nothing about the  
8 molestations in that book, correct?

9 A. No, sir.

10 Q. Okay. Did y'all have any discussion about  
11 including accounts of the molestations in that book  
12 Growing Up Duggar?

13 A. No.

14 Q. Who published the book?

15 A. I think Simon & Schuster maybe, but I'm not  
16 sure.

17 Q. Who was your contact with the publisher?

18 A. We had a lady that was helping us. I don't  
19 remember her name. Jill probably already told you  
20 because she has a better memory about, like, the book  
21 stuff, I think. But I don't -- I don't remember her  
22 name.

23 Q. Let me use a term, you let me know if you're  
24 unfamiliar with it. Did y'all have a ghostwriter?

25 A. We did have, yeah. Our contact was, like, a

1 totally different.

2 Q. Okay. Were you on this trip to Central America  
3 where the bodyguard was murdered?

4 A. I don't -- I don't believe so.

5 Q. Okay.

6 A. I did know that man, I believe. But I don't  
7 think -- I wasn't on that trip.

8 Q. [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 A. [REDACTED]

12 Q. In that interview, you said that your marriage  
13 was great. Everything was going great in your  
14 marriage. Does that remain correct?

15 A. Yes, sir. I have a wonderful marriage.

16 Q. I honestly felt guilty after reading all of  
17 y'all's descriptions of your marriages. I had to go  
18 home and buy flowers for my wife. I've been married  
19 21 years.

20 A. Oh.

21 Q. You've got to keep it going.

22 A. Yes, sir. That's part of life.

23 Q. [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 [REDACTED]  
2 A. [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 Q. [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 A. [REDACTED]  
10 Q. [REDACTED]  
11 A. [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 Q. [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 A. [REDACTED]  
20 Q. Bad question. Let me withdraw and ask it a  
21 different way. [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]



1 Q. In your perspective, what would have been better  
2 for your parents to have done than what they did?

3 MR. BLEDSOE: Object to the form.

4 A. I don't know. I mean, I -- I -- yeah. I don't  
5 know.

6 Q. Have they ever said to you that they wish they  
7 had done anything in particular differently?

8 A. No. No. Just they think that they probably  
9 could have done better.

10 Q. You never blamed yourself for anything, have  
11 you, in relation to your molestations?

12 A. No. No.

13 Q. [REDACTED]

14 [REDACTED]

15 A. [REDACTED]

16 Q. [REDACTED]

17 [REDACTED]

18 MR. BLEDSOE: Object to the form.

19 A. [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]



1

2 A. [REDACTED]

3 Q. At the time of these redacted disclosures, you  
4 were married, correct?

5 A. Yes.

6 Q. Where were you living at that time?

7 A. Same place that I live right now.

8 Q. In Springdale? I'm sorry.

9 A. Fayetteville.

10 Q. You told me Fayetteville. And your parents were  
11 living in what town?

12 A. Springdale.

13 Q. Okay. After these redacted disclosures were  
14 published, did you move back in with your parents?

15 A. No.

16 Q. Did you go to stay at their house overnight?

17 A. Maybe.

18 Q. There was some testimony -- I am going to  
19 represent to you there was some testimony in earlier  
20 depositions about the family retreating to another  
21 location for a month or so. Do you recall that?

22 A. Yes, sir. Yeah. They left town.

23 Q. Yeah. Did you go out there with them?

24 A. I didn't stay out there. I think I visited them  
25 a time or two.

1 sisters?

2 MR. BLEDSOE: Object to the form.

3 A. No.

4 Q. Why not?

5 MR. BLEDSOE: Object to the form.

6 A. I just don't.

7 Q. Okay. Other than today, obviously, when you're  
8 being asked questions about a lawsuit related to this,  
9 how often do you think about your molestation by Josh  
10 or these redacted police disclosures and publications  
11 that followed?

12 MR. BLEDSOE: Object to the form.

13 A. Not constantly. It is something I do think  
14 about from time to time.

15 Q. Okay. Once or twice a year?

16 MR. BLEDSOE: Object to the form.

17 A. I don't know. I mean, we're still in this  
18 lawsuit. So in some ways, it's something that's --  
19 like, there's not been closure yet. So I guess in  
20 that sense, I do probably think about it more.

21 Q. So this lawsuit is preventing you from achieving  
22 closure?

23 MR. BLEDSOE: Object to the form.

24 A. No.

25 Q. Okay. Is there anything that you are unable to

1 do in your day-to-day life because of the disclosures  
2 six years ago?

3 MR. BLEDSOE: Object to the form.

4 A. What do you mean? Like, I can't go to the  
5 grocery store or something? Like --

6 Q. Yeah. Does the fact of those disclosures six  
7 years ago, a little more than six years ago now,  
8 prevent you from functioning in any way in your  
9 day-to-day life?

10 MR. BLEDSOE: Object to the form.

11 A. There's -- there's ongoing shame I feel like  
12 over -- over that. And, like, I still will face  
13 negative stuff, like, say on my social media and stuff  
14 like that from time to time. People still bring that  
15 up. Like, I still face that. But it's not like I  
16 can't go to the grocery store or take my kids to the  
17 park.

18 Q. The negative stuff on social media, do you feel  
19 like that's directed toward you or to Josh?

20 A. Both. Sometimes it's more him, but sometimes  
21 it's, like "the whole family is a bunch of sickos"  
22 kind of stuff. Like, we're all in it together.  
23 People lump us all together.

24 Q. Okay. As we sit here today, do you believe the  
25 general public knows the identity of the non-family



1 left. Why don't we take our lunch break  
2 now, if that's okay with everybody.

3 Tom, you want to chime in on timing?  
4 What did you say?

5 MR. KIEKLAK: 1:15 is fine.

6 MR. OWENS: Would that be okay with  
7 everybody?

8 MR. BLEDSOE: Fine with me.

9 MR. OWENS: We'll take a lunch break now  
10 and resume at 1:15. Thank you.

11 THE WITNESS: All right.

12 THE VIDEOGRAPHER: The time is 12:18.  
13 We are now off the record.

14 (Recess from 12:18 p.m. to 1:15 p.m.)

15 THE VIDEOGRAPHER: The time is 1:15. We  
16 are now on the record.

17 Q. Hi, Ms. Seewald. We are back on the record.  
18 Let me ask you, have you -- how long were you on a  
19 reality TV show?

20 A. Maybe -- my family was filmed for about 17  
21 years. The reality show wasn't quite that long.  
22 Maybe -- maybe 15 years.

23 Q. During that TV show, the run of that TV show,  
24 particularly the first television show, did you find  
25 yourself being recognized in public?



1 A. Like, 19 Kids & Counting, you're saying, or,  
2 like, those ones?

3 Q. 19 Kids & Counting, the first TV show.

4 A. Yeah. Yeah.

5 Q. Did you make appearances based on your status as  
6 a public figure?

7 A. We would sometimes, like, go to different  
8 churches and do things, like, my parents would give a  
9 talk or stuff like that.

10 Q. Did anybody ever stop you to take a selfie?

11 A. Yeah.

12 Q. Anybody ever ask you for your autograph?

13 A. Uh-huh.

14 Q. Is that a yes?

15 A. Yes, sir.

16 Q. How frequently would those kind of things happen  
17 when you were out in public? Pretty much every time  
18 you went out or --

19 A. Yeah. A lot. I mean, like, even if people  
20 didn't stop me, I could see them taking pictures on  
21 their phone and stuff like that.

22 Q. Right. Okay. What private fact, if any, do you  
23 think the separate Washington County defendants,  
24 Washington County or Rick Hoyt, disclosed about you  
25 publically?

1 attributable to each and every member of the immediate  
2 family?

3 A. I think so.

4 Q. Okay. You allege in this case that you were  
5 emotionally distressed and mentally anguished,  
6 correct?

7 A. Yes.

8 Q. Any -- have you been harmed in any other way as  
9 a result of the redacted disclosures in this case?

10 MR. BLEDSOE: Object to the form.

11 A. What do you mean?

12 Q. Other than -- yeah. I mean, other than  
13 emotional distress or mental anguish, have you been  
14 harmed in any other way?

15 MR. BLEDSOE: Object to the form.

16 A. I don't know.

17 Q. Okay. You have told me that you did not see  
18 your name in any of the redacted disclosures. Did you  
19 see any other information that would publically  
20 disclose your identity?

21 MR. BLEDSOE: Object to the form.

22 A. I haven't reread that recently, so I don't know.

23 Q. Okay. You would describe yourself as not a  
24 particularly emotional person, wouldn't you?

25 MR. BLEDSOE: Object to the form.

1 you had that same sort of feeling, or were you more  
2 reluctant to do that second show?

3 A. No, I wasn't reluctant. I was on board with it.

4 Q. Okay. And so you enjoyed that in the same way  
5 you think?

6 A. Uh-huh. I mean, getting through the first few  
7 shows is probably awkward because just the content.  
8 But, like, overall, it was just focus on family and  
9 our kids and our life, and so that was fun.

10 Q. When you were on the show as a -- when you still  
11 lived in your parents' house, the Counting On show --  
12 I mean, the And Counting show, who made the most  
13 decisions as far as, you know, about what would get  
14 filmed, who would be filmed, and who would be in the  
15 show?

16 A. We all would. We would come up with different  
17 ideas and things we'd do, and talk back and forth  
18 with, like, our producers and stuff.

19 Q. And did you feel like anyone had sort of the  
20 final say, or was the person who made, like, in the  
21 end of the process the decisions?

22 A. Well, if I thought an idea was dumb, I was not  
23 afraid to speak my mind. I'd be like, "That's dumb.  
24 I'm not doing that."

25 Q. So each of you could sort of decide on your own



1 know, when TLC found out, you know, and the first show  
2 ended up being canceled. Do you -- do you ever recall  
3 a time when you felt like "I want to be careful. I  
4 want to keep this secret on the show at least," not  
5 necessarily with my mom or my sisters. But we're not  
6 going to -- we can't let this part of our life on the  
7 show? Did you ever feel pressure about that?

8 A. I didn't really think about that because it  
9 wasn't something we thought much about or talked about  
10 within our family. It was something that kind of  
11 happened in the past and, I mean, a few friends maybe  
12 knew, but we didn't really have, like, a -- like, we  
13 didn't even really think about that becoming, like,  
14 public knowledge.

15 Q. Okay. And do you recall the situation when you  
16 guys went up to Chicago to be on Oprah?

17 A. Sort of.

18 Q. Well, tell me what you remember about that, if  
19 anything.

20 A. We filmed an Oprah, but they didn't air it.

21 Q. Do you remember why?

22 A. Yes. Somebody, like, told them something about  
23 the situation, and that's why they didn't air it.  
24 That's what I heard.

25 Q. So to be clear, the situation would be the



1 with, like, a spinoff show if they were wanting to do  
2 that. Like, yeah. I didn't feel, like, pressured.  
3 Like, I was happy to do it if they were up for that.

4 Q. Do you recall anyone ever saying to you, "We  
5 really hope you will do that. You know, we really are  
6 counting on you to do that"?

7 A. No.

8 Q. May we talk about social media for a second? I  
9 think you've testified about certain social media  
10 accounts. I think those are -- I won't make you say  
11 it again, but tell me if I'm wrong. Instagram,  
12 YouTube, Facebook, and Twitter?

13 A. Uh-huh.

14 Q. Would you mind, if you can remember, how many  
15 Facebook accounts do you have?

16 A. One.

17 Q. And what do you call that one? What's your  
18 handle?

19 A. Jessa Seewald.

20 Q. And how about YouTube? How many YouTube  
21 accounts or --

22 A. One.

23 Q. Just one? What is that one called?

24 A. Jessa Seewald.

25 Q. And Facebook?

1 A. Jessa Seewald.

2 Q. And so just the one?

3 A. Yeah.

4 Q. Okay. And same with Twitter?

5 A. Yeah.

6 Q. Just one? Do you share those with your husband  
7 or does he have separate ones besides --

8 A. He has his own. He doesn't do YouTube. But  
9 yeah, he has Twitter. Ben Seewald on Twitter.

10 Ben Seewald on Instagram. And Ben Seewald on Facebook  
11 page.

12 Q. Okay. And then he also posts, I think, to the  
13 church Facebook as well?

14 A. I think somebody else runs that for him.

15 Q. Okay. Do you use any other kind of app besides  
16 your, kind of, iPhone texting to communicate? Do you  
17 use any kind of a instant messenger or Slack or  
18 anything like that besides just texting?

19 A. No.

20 Q. Okay.

21 A. Just texting.

22 Q. Okay. Social media, you mentioned that you made  
23 money last year. You do make money during the year  
24 doing social media work. When I say social media  
25 partnerships, that's kind of what I mean. Like you're

1 partnering with a product, an agency, something like  
2 that. So that's what I'm going to use. And I just  
3 want to ask you if you enjoy doing that work, if you  
4 enjoy the social media partnerships.

5 A. Yeah.

6 Q. What do you do, Ms. Seewald, to sort of foster  
7 or grow that business?

8 A. Not much. I mean, yeah. We have people that  
9 will contact us and want us to promote their brand or  
10 their product, I guess.

11 Q. Okay. When you say you have people, are those  
12 people that you have a contract with, are contracted  
13 to work with?

14 A. I don't actually, like, contact people or, like,  
15 they don't contact me directly. They go through -- I  
16 worked through Central Entertainment Group for a  
17 little while, and then I worked through the Gift Shop  
18 for a little while.

19 Q. Are you still with the Gift Shop?

20 A. Yes, sir.

21 Q. Okay. And so they're the ones that bring you  
22 ideas, if you want to do this or not sort of thing?

23 A. Yes.

24 Q. Okay. So you mentioned you don't do much to  
25 foster or grow that. Could you do more if you could,



1 if you could do it and work into the time that you  
2 have available for it?

3 A. Well, I just -- people have reached out to the  
4 agents and, like, they'll send me stuff. And it's  
5 been -- yeah. It's been, like, plenty of stuff, like,  
6 I don't feel like I need to go looking for anything.

7 Q. Okay.

8 A. I'm a busy mom, too.

9 Q. Right. Right. You said four, right?

10 A. Yes.

11 Q. What is it -- what is the Gift Shop looking for  
12 from you to continue to want to bring you products?  
13 Are they looking for activity on your social media  
14 accounts by way of, you know, followers or hits or  
15 views, or is there something else they're looking for  
16 when they want to work with you, as far as you know,  
17 as far as you understand?

18 A. They don't run any of my social media or  
19 anything like that. So I just post, like, whatever  
20 regular stuff, and all they do is they just -- people  
21 contact them if they're interested in, like,  
22 advertising with us. So I don't know what -- how they  
23 judge all that or whatever.

24 I mean, I guess I've got kids, so maybe  
25 people might be sending me, like, kid clothes products



1 or things like that that they're interested in me  
2 promoting. Like, kid family stuff. Like, it's  
3 probably just like whatever my daily life kind of  
4 looks like, they -- I don't know how I am with that.

5 Q. Would you do more -- would you do more  
6 television if you could? If the offer came along to  
7 do reality TV, would you do that?

8 A. Not right now.

9 Q. Why not?

10 A. I'm busy.

11 Q. You're so --

12 A. Life is busy right now. I mean, I've got, yeah,  
13 four young kids and all that.

14 Q. Okay. So this is a little bit of a rhetorical  
15 question, but who in the world could be busier than  
16 your mom when she was doing the show, right? So --

17 A. It's not that I couldn't. It's just that, like,  
18 do I have desire. I guess I don't really -- I'm not  
19 looking to turn around and, like, do it all over again  
20 right now.

21 Q. Okay. Do you have that planned in the future?  
22 Like, at a certain point, we might be open to that  
23 again, or is that just not something --

24 A. I'm not planning on it for any period of time,  
25 but I'm not saying that I wouldn't ever either. Like,

1 about the system of beliefs in the religion that you  
2 guys follow? By you guys, I don't want to lump all of  
3 you together because I know that there's a difference  
4 between you and your sisters. But just you and your  
5 family, your immediate family.

6 MR. BLEDSOE: Object to the form.

7 A. Not especially, I don't feel like.

8 Q. Okay.

9 A. I mean, we're Christians, but there's a lot of  
10 Christians in this country. Yeah.

11 Q. Going back to 2014, prior to the release of the  
12 information, do you recall that your mom made what  
13 were called robo calls, calls that contacted people  
14 about an ordinance in Fayetteville, a civil rights  
15 ordinance in Fayetteville? Do you remember that?

16 A. Uh-huh.

17 Q. Okay. What do you recall about it?

18 A. Just what you said. She recorded that robo  
19 call.

20 Q. Okay. Do you remember any of it? Did she  
21 receive any positive attention for that?

22 MR. BLEDSOE: Object to the form.

23 A. No. I don't really remember.

24 Q. Or negative attention for that?

25 A. I mean, I guess it probably depends on what side

1 the name before, I don't know who that is. I couldn't  
2 tell you.

3 Q. Well, I was going to ask about the other two  
4 people who are individuals who you guys sued, and  
5 that's Ernest Cate and Kathy O'Kelley. Do you know --  
6 would you know Ernest Cate if he walked down the  
7 street right now?

8 A. No.

9 Q. Have you ever met him before?

10 A. I don't think so, but I don't know.

11 Q. Okay. How about Kathy O'Kelley, do you know  
12 her?

13 A. As far as I know.

14 Q. How do you know her?

15 A. No. I don't -- I don't think I know her. I  
16 don't know if -- my dad has been in politics for a  
17 long time, so I could have met someone at an event one  
18 time. You know, like, I don't know.

19 Q. That's fair. So they're both sued. Do you sort  
20 of -- sitting there right now, do you have an idea of  
21 what you think, just you think, Ernest Cate did?

22 A. If I knew who the person was in their capacity,  
23 then I might know by their title rather than just  
24 their name. I don't know.

25 Q. Okay. How about Kathy O'Kelley?



1 A. The police chief?

2 Q. Yes, ma'am. She's the former police chief.

3 A. Yeah. I'm not the most knowledgeable person in  
4 this case, but yeah. I think she had a friendship  
5 with one of the ladies at the law firm. Like, she put  
6 In Touch in contact with the law firm in Little Rock  
7 to contact them for the FOIA or something like that.

8 Q. So you've -- at least what you've been told or  
9 what you've learned is Kathy O'Kelley contacted  
10 In Touch and put them in touch with a law firm in  
11 Little Rock?

12 MR. BLEDSOE: Jessa, I am going to  
13 object to the form. Tell you not to expose  
14 attorney/client --

15 THE COURT REPORTER: I'm sorry.

16 Q. Hey, don't tell me what your lawyer told you.  
17 Never tell me that.

18 MR. BLEDSOE: I'm still talking. Do you  
19 mind?

20 Q. I should have said at the beginning. One thing  
21 I never want to know is what Mr. Bledsoe or any other  
22 of the attorneys -- and if I ask a question that you  
23 go, "Well, I remember Mr. Bledsoe," don't tell me  
24 that.

25 A. No. That wasn't something I heard from the



1 lawyer. That's something that I read on the e-mail  
2 and then something that my dad told me --

3 Q. Okay.

4 A. -- that he had heard, so...

5 Q. Well, from what you've read or your dad told  
6 you, anything else, do you have any -- do you believe  
7 that she was trying to hurt you guys personally, or  
8 you personally?

9 A. I guess that remains to be seen, I mean, with  
10 the evidence. I don't know.

11 Q. But do you have a belief about that?

12 A. I don't know. I mean, I guess that's what we're  
13 trying to prove or disprove, right?

14 Q. Do you know of any evidence of that?

15 A. No. I suppose you'd want to just check her  
16 e-mails and check her texts and see if there's any  
17 truth to that. I don't know.

18 Q. Okay.

19 A. I hope she didn't destroy any evidence, just  
20 like you hope we didn't. I don't know.

21 Q. Okay. Do you think she did destroy anything?

22 A. No, I'm not saying she did. I'm just saying,  
23 like, if you don't have all the texts or all the  
24 interactions or you don't know all the friendships,  
25 then there's always possibilities, right? Like, maybe

1 big news break.

2 Q. Did you tell anyone that that's what you wanted  
3 to do, you wanted to make a response on television?

4 A. Yeah. I mean, I -- I was up for it.

5 Q. Was it your idea to do that?

6 A. I mean, I was fine to, like, speak out. Yeah.  
7 Like, they -- I think we were trying to discuss, like,  
8 you know, will we say something? Will we respond?  
9 Will we just be quiet? And I was like, "I'll say  
10 something." Like, I'll say something.

11 Q. Okay. What do you recall receiving ahead of the  
12 actual interview to get you prepared?

13 A. I don't remember. I think we probably got  
14 together and talked about, like, how are we going to  
15 do it or something. I mean, I'm sure we talked about  
16 it beforehand. I don't think I would just walk in and  
17 sit on the set kind of thing. I think we probably had  
18 a conversation about it.

19 Q. Do you remember Chad Gallagher being very  
20 involved in that process?

21 A. I mean, I'm pretty sure he was there. He was --  
22 he's been with us through thick and thin, so I'm  
23 pretty sure he was part of it.

24 Q. Do you remember Chad Gallagher actually sending  
25 you information about the very specific scope of the

1 interview, even questions and answers?

2 A. No. I don't -- he may have sent us, like, a  
3 overview of, like, what the interview might be  
4 touching on but not, like, answers. I mean, answers  
5 are your own. So...

6 Q. Okay. In the interview, you said, "Josh is not  
7 a child molester, a pedophile, or a rapist. That is  
8 so overboard and a lie really." Is that still your  
9 position? Do you still believe that?

10 MR. BLEDSOE: Object to the form.

11 A. Can -- can you repeat that again?

12 Q. I sure can. It says, "Josh is not a child  
13 molester, a pedophile, or a rapist. That's so  
14 overboard and a lie." I wonder if that's still your  
15 position today, knowing what you know now?

16 MR. BLEDSOE: Object to the form.

17 A. I would say at that time that I was looking at  
18 him as who he was in that season of life. Like, I  
19 wouldn't view him that way. As far as, like, his  
20 current case, like, I think I'm not going to make a  
21 judgment call on that because it's not been decided  
22 yet.

23 Q. So with regard to that statement, you're not  
24 sure what you believe yet at this point?

25 A. Well, no.